

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION**

DARREN ANDERSON, et al.

Plaintiffs,

v.

**WAYNE FARMS, LLC.,
et al.,**

Defendant.

§
§
§
§
§
§
§
§
§
§

**CIVIL ACTION NO.
2:06-cv-00951-MEF-DRB**

**NOTICE OF FILING ADDITIONAL NOTICES OF
CONSENT TO JOIN**

Plaintiff, DARREN ANDERSON, et., al., gives notice of filing the attached Notices of Consent to Join executed by, JOSEPHINE BATTLE , similarly situated employee to Plaintiffs, who likewise are or were subjected to the illegal pay practices at issue, and who wish to join the above-captioned lawsuit.

Dated: March 12, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD NOMBERG

505 North 20th Street, Suite 825
Birmingham, AL 35203

(205) 930-6900 (Phone)
(205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr.
Lance H. Swanner
THE COCHRAN FIRM, P.C.
163 West Main Street
P. O. Box 927
Dothan, AL 36302
(334) 793-1555 (Phone)
(334) 793-8280 (Fax)

– and –

Richard Celler
MORGAN & MORGAN, P.A.
284 South University Drive
Fort Lauderdale, Florida 33324
Toll Free: 1-877-435-9243 (WAGE)
Facsimile: (954) 333-3515

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2007, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Dorman Walker
dwalker@balch.com

Lisa Sharp
lsharp@balch.com

Wendy A. Madden
wmadden@balch.com

Pepper Crutcher, Jr.
pcrutcher@balch.com

//s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Josephine Battle states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Wayne Farms at
[Name of Plant]
the facility located in Union Springs, AL I worked at this location from
[City/State]
Sep 24, 1996 to Present
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Wayne Farms plant in Union Springs, AL and
[Name of Plant] [City/State]
possibly other plants owned by Wayne Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 21 day of February, 2007.

Josephine Battle
[PRINT NAME]

Josephine Battle
[SIGN NAME]